18-00243-NPO Dkt 26 Filed 03/01/18 Entered 03/01/18 11:32:17 Page 1 of 2

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

**SHEREADA MANUEL** 

**CHAPTER 13** 

**CASE NO.: 18-00243-NPO** 

**OBJECTION TO CONFIRMATION OF PLAN** 

COMES NOW, RIVERHILLS BANK, by Leslie R. Sadler, its attorney, and shows unto this Honorable Court as follows, to-wit:

1. RiverHills Bank holds a secured claim covering the following four automobiles: 2005 Chrysler PT Cruiser VIN 3C4FY48B65T559367; 2000 Oldsmobile Sillouette VIN 1GHDX03E6YD175159; 2000 Oldsmobile Sillouette VIN 1GHDX03E0YD107911; and a 1993 Ford Van VIN 1FBJS31H2PHB27756. See Proof of Claim No. 6 filed in this cause for copies of all loan documents, personal guaranty, and Certificates of Title evidencing RiverHills Bank's secured claim.

- 2. RiverHills Bank shows that the total amount of the debt owed to RiverHills Bank is \$13,054.63, and the value of the collateral as evidenced by the NADA values attached to Proof of Claim No. 6 is \$13,882.50.
- 3. The Debtor does not include RiverHills Bank as a secured creditor in her Schedules or in her Plan and does not provide for the proper treatment of RiverHills Bank as a secured creditor.
- 4. The Chapter 13 Plan does not comply with the provisions of the Bankruptcy Code therefore the Plan should not be confirmed and the case should be dismissed.

WHEREFORE, RiverHills Bank objects to confirmation as aforesaid and requests that this case be dismissed; and RiverHills Bank requests such other relief to which it may be entitled in the premises.

Respectfully Submitted,

RIVERHILLS BANK

BY:/s/ Leslie R. Sadler
LESLIE R. SADLER (MSB #101513)
Attorney for Movant
901 Belmont Street
Vicksburg, MS 39180
(601)636-5433
lsadler@ellislawms.com

## **CERTIFICATE OF SERVICE**

I, Leslie Sadler, Attorney for RiverHills Bank, do hereby certify that on the 1st day of March, 2018, I caused a true and correct of the above and foregoing Objection to Confirmation to be filed in this proceeding via CM/ECF and or Unites States Postal Service to:

United States Trustee, USTPRegion05.AB.ECF@usdoj.gov

Branan P. Southerland Attorney for Debtor branan@southerlandlaw.net

Ch. 13 Trustee Harold J. Barkley, Jr. HJB@HBarkley13.com

So certified this the 1st day of March, 2018.

/s/Leslie R. Sadler